

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

COMMITTEE ON WAYS AND MEANS, UNITED
STATES HOUSE OF REPRESENTATIVES,

Plaintiff,

vs.

UNITED STATES DEPARTMENT OF THE
TREASURY et al.,

Defendants.

Case No. 19-cv-01974-TNM

CONSENT MOTION FOR LEAVE TO EXCEED PAGE LIMIT

1. Pursuant to Local Rule 7(e), Plaintiff Committee on Ways and Means of the United States House of Representatives (Committee) moves for leave to file its forthcoming Memorandum of Law in support of its Motion for Summary Judgment at a length of up to 55 pages.

2. On July 2, 2019, the Committee filed an eight-count complaint to seek relief from Defendants' refusal to produce tax returns and return information concerning President Donald J. Trump in response to the Committee's request under section 6103(f) of the Internal Revenue Code, 26 U.S.C. § 6103(f), and subpoenas issued to Defendants.

3. On July 18, 2019, the Court granted an Unopposed Motion to Intervene by Donald J. Trump (in his individual capacity) and various Trump-related businesses.

4. The legal issues presented in this case—which marks the first time that a request for tax returns and return information by the Committee has been refused under section 6103(f)—are numerous, important, and complex. Moreover, although the Court has instructed

Intervenor-Defendants to “meet and confer with the Defendants to determine whether their position may be set forth in a consolidated manner,” Order (July 18, 2019), ECF No. 14, the Committee does not have confirmation that Defendants and Intervenor-Defendants will be making consolidated filings in this litigation. The Committee thus anticipates that each will raise distinct issues. *Compare* Compl. ¶¶ 62, 66, Exs. C, F (letters from counsel for Intervenor-Defendants contesting legality of Committee’s requests), *with* Compl. ¶¶ 83-86 (opinion from Department of Justice’s Office of Legal Counsel providing distinct reasons for Defendants’ noncompliance with Committee’s requests).

5. In light of these factors, the Committee believes that an extension of up to ten pages will enable the Committee to best assist this Court in analyzing the various legal issues presented here. The Committee, consequently, moves for leave to exceed the page limitation established by the Local Rules.

6. Pursuant to Local Rule 7(m), counsel for the Committee has conferred with counsel for Defendants and Intervenor-Defendants, who consent to this motion to exceed the page limit.

7. The Committee is prepared to file its Motion for Summary Judgment and supporting papers promptly upon this Court’s ruling on this motion.

Respectfully submitted,

/s/ Douglas N. Letter

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August 15, 2019

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2019, I caused the foregoing document to be filed via this Court's CM/ECF system, which I understand caused service on all registered parties.

/s/ Douglas N. Letter
Douglas N. Letter

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[PROPOSED] ORDER

UPON CONSIDERATION of Plaintiff's Consent Motion for Leave to Exceed Page
Limit, it is hereby

ORDERED that Plaintiff's motion is granted and it is

FURTHER ORDERED that Plaintiff's forthcoming Memorandum of Law in support of
its Motion for Summary Judgment may be up to 55 pages in length.

Dated: _____

TREVOR N. McFADDEN
United States District Judge